

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	
SHANNON SCOTT BURGESS AND	§	CASE NO. 13-32312-H4-7
AMBER NICOLE BURGESS,	§	(CHAPTER 7)
DEBTORS	§	
	§	

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**Trustee's Motion to for All Creditors, the U.S. Trustee,  
and the Chapter 7 Trustee to Extend Time to Object to  
Discharge and Dischargeability**

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**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

TO THE HONORABLE JEFF BOHM, U.S. BANKRUPTCY JUDGE:

Rodney Tow, Trustee, files this Motion to Extend Time for All Creditors, the U.S. Trustee, and the Chapter 7 Trustee to Object to Discharge and Dischargeability and would show the Court as follows:

1. This Motion is filed pursuant to 11 U.S.C. §§523 and 727 and Bankruptcy Rule 4004 and 4007. The Trustee seeks an extension of time for the Trustee, the United States Trustee, and the creditors to object to discharge or dischargeability.
2. This case was filed on April 19, 2013. The first 341 meeting which was to occur on May 28,

2013 was continued to a subsequent meeting on June 14, 2013.

3. Originally the Trustee filed a No Asset Report but subsequently was contacted by a creditor asserting that Mr. Burgess failed to disclose his sole proprietorship CPA practice which may have hundreds of clients. The Trustee and creditors, as well as the U.S. Trustee, need to determine if such a business exists. If it does, there may be sufficient information to file an objection to Mr. Burgess's discharge.

Based on the foregoing, the Trustee requests the Court to extend the time to object to discharge and dischargeability to October 31, 2013 and for such other relief at law or in equity as is just.

Respectfully submitted,

/s/Rodney Tow  
Rodney Tow  
State Bar Number 20152500  
Fed ID 3196  
Tow & Koenig, PLLC  
26219 Oak Ridge Drive  
Woodlands, TX 77380  
281-681-9100  
281-681-1441 Fax

#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was mailed by first class US mail postage prepaid or via electronically to all parties listed on attached service list.

Signed this July 18, 2013.

/s/Rodney Tow  
Rodney Tow

Label Matrix for local noticing  
0541-4  
Case 13-32312  
Southern District of Texas  
Houston  
Thu Jul 18 11:33:03 CDT 2013

First Community Bank, N.A.  
c/o The Holoway Jones Law Firm, PLLC  
407 Julie Rivers  
Sugar Land, Tx 77478-3181

Sheffield Financial  
PO Box 1847  
Wilson, NC 27894-1847

Allegiance Bank  
3963 Kirby Dr  
Houston, TX 77098-4103

Brazos Valley Urgent Care  
2911 Texas Ave S, Ste 103  
College Station, TX 77845-5388

Capital One  
Bankruptcy Dept  
PO Box 30285  
Salt Lake City, UT 84130-0285

Chase Manhattan Bank  
Bankruptcy Department  
Mail Code KY1-0900  
6714 Grade Lane Bldg. 8 Suite 807  
Louisville, KY 40213-3404

CompUSA / Tiger Direct.com  
PO Box 105658  
Atlanta, GA 30348-5658

Experian Information Solutions  
NCAC  
701 Experian Parkway  
Allen, TX 75013-3713

(p)FORD MOTOR CREDIT COMPANY  
PO BOX 6275  
DEARBORN MI 48121-6275

Ally Financial  
P.O. Box 130424  
Roseville, MN 55113-0004

Post Oak Bank, N.A.  
2000 West Loop South  
Suite 100  
Houston, Tx 77027-4069

4  
United States Bankruptcy Court  
PO Box 61010  
Houston, TX 77208-1010

Ally Automotive Financing  
Attn Bankruptcy Dept  
P. O. Box 380901  
Bloomington, MN 55438-0901

CNH Capital  
PO Box 3600  
Lancaster, PA 17604-3600

Chase (Best Buy)  
PO Box 94014  
Palatine, IL 60094-4014

Chase Slate / Business Card  
PO Box 94014  
Palatine, IL 60094-4014

Discount Tire / Atlanta Collection & Rec  
4125 Winward Plaza Dr  
Alpharetta, GA 30005-8738

First Community Bank  
Three Sugar Creek Center, Ste 200  
Sugar Land, TX 77478-2212

GE Capital  
Bankruptcy Dept  
PO Box 103104  
Roswell, GA 30076-9104

Capital One, N.A.  
Bass & Associates, P.C.  
3936 E. Ft. Lowell Road, Suite #200  
Tucson, AZ 85712-1083

Prosperity Bank  
c/o Jay H. Dushkin  
4615 Southwest Freeway, Suite 600  
Houston, TX 77027-7142

A+ Federal Credit Union  
PO Box 14867  
Austin, TX 78761-4867

Ben Bridge Jewelers  
PO Box 1908  
Seattle, WA 98111-1908

CSC Credit Services  
652 N Sam Houston Parkway East  
Houston, TX 77060-5994

Chase Home Finance  
Attn Bankruptcy Dept  
PO Box 182106  
Attn Dept G-7--PP  
Columbus, OH 43218-2106

Citizens State Bank  
PO Box 1247  
Perry, FL 32348-1247

Douglas Parker CPA  
17007 Copper Shore Dr  
Houston, TX 77095-4329

First Horizon / First Tennessee Bank  
PO Box 31  
Memphis, TN 38101-0031

GE Capital Retail Bank  
PO Box 965009  
Orlando, FL 32896-5009

GE Capital Retail Bank / BELK  
PO Box 530940  
Atlanta, GA 30353-0940

GE Capital Retail Bank / Car Care One  
PO Box 960061  
Orlando, FL 32896-0061

GE Capital Retail Bank / JC Penney  
PO Box 960090  
Orlando, FL 32896-0090

GE Capital Retail Bank / Lowes  
PO Box 530914  
Atlanta, GA 30353-0914

GE Capital Retail Bank / Wal-Mart  
PO Box 530927  
Atlanta, GA 30353-0927

HSBC Best Buy  
PO Box 5893  
Carol Stream, IL 60197-5893

Harrell and Johnson Dentistry  
Crabb River Rd  
Richmond, TX 77469

Houston ENT Associates  
9494 SW Frwy, Ste 850  
Houston, TX 77074-1433

Houston Radiology  
12951 South Frwy  
Houston, TX 77047-1923

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Jay Dushkin  
4615 Southwest Freeway, Suite 600  
Houston, TX 77027-7142

LabCorp  
PO Box 2240  
Burlington, NC 27216-2240

Memorial Herman Hospital Sys.  
PO Box 201367  
Houston, TX 77216-1367

Memorial Hermann / Sullins Johnston  
2200 Phoenix Tower  
Houston, TX 77027

Methodist Hospital  
PO Box 4315  
Houston, TX 77210-4315

Methodist Hospital Sugar Land  
PO box 4755  
Houston, TX 77210-4755

Mid South Bank  
3200 Avenue A  
Beaumont, TX 77705-2016

Mobil Oil FCU/ Business Card  
PO Box 815909  
Dallas, TX 75381-5909

Moble Oil Federal Credit Union  
PO Box 12849  
Beaumont, TX 77726-2849

NelNet  
PO Box 82561  
Lincoln, NE 68501-2561

NewEgg Preferred Credit  
PO Box 105658  
Atlanta, GA 30348-5658

Oak Bend Medical Center  
PO Box 1409  
Richmond, TX 77406-0036

PayPal Smart Connect  
PO Box 981064  
El Paso, TX 79998-1064

Post Oak Bank  
1600 Hwy 6 South Suite 150  
Sugar Land, TX 77478-4922

Prosperity Bank  
5123 Bellaire Blvd.  
Bellaire, TX 77401-4419

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Estes Park, CO 80517-9647

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Katy, TX 77450-7580

Sallie Mae Student Loans  
PO Box 9500  
Wilkes-Barre, PA 18773-9500

Sheffield Financial  
6010 Golding Ctr Drive  
Winston Salem, NC 27103-9815

Singleton Associates PA  
PO Box 4346 Dept 808  
Houston, TX 77210-4346

Specialized Collection Systems  
PO Box 441508  
Houston, TX 77244-1508

SunTrust Bank  
Bankruptcy Dept  
PO Box 85092  
Richmond, VA 23285-5092

Texas Children's Hospital  
PO Box 4780  
Troy, MI 48099-4780

Texas Children's Physican Services  
PO Box 4984  
Houston, TX 77210-4984

Trans Union Consumer Solutions  
PO Box 2000  
Chester, PA 19016-2000

US Trustee  
Office of the US Trustee  
515 Rusk Ave  
Ste 3516  
Houston, TX 77002-2604

Wells Fargo  
PO Box 10475  
Des Moines, IA 50306-0475

Wells Fargo Card Services  
Bankruptcy Dept  
P.O. Box 30086  
Los Angeles, CA 90030-0086

Wells Fargo Financial  
800 Walnut/Doc. Dept  
Des Moines, IA 50309-3891

Wells Fargo Financial  
PO Box 660431  
Dallas, TX 75266-0431

Wells Fargo Financial / Mattress Giant  
PO Box 10475  
Des Moines, IA 50306-0475

Wells Fargo Visa  
PO Box 660041  
Dallas, TX 75266-0041

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7314 Whistle Court  
Sugar Land, TX 77479-6476

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Ford Motor Credit Co.  
Bankruptcy Department  
Post Office Box 537901  
Livonia, MI 48153-7901

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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Bypassed recipients	3
Total	79